

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

CHRISTIAAN HIGHSMITH (CABN 296282)  
DAVID WARD (CABN 239504)  
Assistant United States Attorneys

MATTHEW CHOU (CABN 325199)  
Special Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7230  
christiaan.highsmith@usdoj.gov  
David.ward@usdoj.gov  
matthew.chou2@usdoj.gov

Attorneys for United States of America

MICHAEL J. SHEPARD (SBN 91281)  
*mshepard@kslaw.com*

KING & SPALDING LLP  
50 California Street, Suite 3300  
San Francisco, California 94111  
Telephone: (415) 318-1221

KERRIE C. DENT (admitted *pro hac vice*)  
*kdent@kslaw.com*  
KING & SPALDING LLP  
1700 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
Telephone: (202) 626-2394

CINDY A. DIAMOND (SBN 124995)  
*cindy@cadiamond.com*  
ATTORNEY AT LAW  
58 West Portal Ave #350  
San Francisco, CA 94127  
Telephone: (408) 981-6307

Attorneys for Defendant Marcus Andrade

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 20-CR-00249-RS (LB)
	)	
Plaintiff,	)	<b>STIPULATED ORDER</b>
	)	<b>CLARIFYING TERMS OF</b>
v.	)	<b>PROTECTIVE ORDER</b>
ROWLAND MARCUS ANDRADE,	)	<b>GOVERNING DISCOVERY</b>
	)	
Defendant.	)	
	)	

With the agreement of the parties, the Court enters this Order to clarify the terms of the Stipulation and Protective Order that governs discovery in this case (Dkt. #24, Oct. 15, 2020). The Stipulation and Protective Order dated October 15, 2020 remains in full force and effect, but with the two clarifications set forth below.

1 IT IS HEREBY ORDERED that the first paragraph of page 3 of the Stipulation and  
2 Protective Order, Dkt. #24 at 3:1-4, shall state:

3 The defendant, all members of the defense team, and any witnesses or  
4 experts who receive discovery under this Order shall be provided a copy  
5 of this Order along with those materials and shall initial and date the order  
reflecting their agreement to be bound by it.

6 IT IS FURTHER ORDERED that the middle paragraph of page 3 of the Stipulation and  
7 Protective Order, Dkt. #24 at 3:11-19, shall be clarified by including the following additional  
8 language:

9  
10 As set forth on page 2 of this Protective Order, defense counsel may show  
11 witnesses discovery material produced by the government as long as  
12 Personally Identifying Information and/or Financial Information has first  
13 been entirely redacted from the discovery materials. Redactions are  
unnecessary when a document is shown to a witness who already has seen  
the document because the witness drafted the document or the document  
was sent to them.

14 **IT IS SO STIPULATED.**

15  
16 For the Government:

17 ISMAIL J. RAMSEY  
18 United States Attorney

19 /s/

Dated: 9/09/2024

20 CHRISTIAAN HIGHSMITH  
21 DAVID WARD  
Assistant United States Attorneys  
22 MATTHEW CHOU  
Special Assistant United States Attorney  
23

24 For Mr. Andrade:


25 /s/

Dated: 9/09/2024

26 MICHAEL J. SHEPARD  
27 KERRIE C. DENT  
28 CINDY A. DIAMOND

1 **IT IS SO ORDERED.**

2  
3 Dated: 9/12/2024

4   
HON. RICHARD SEEBORG  
Chief United States District Judge